

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

2022 MAY 17 AM 9:28

IN RE:

GRCDALLASHOMES, LLC

Debtor

§  
§  
§  
§  
§

Case No. 19-41186

U.S. BANKRUPTCY COURT

**GREGORY MULLEN RESPONSE TO DEBTOR'S MOTION TO SELL PROPERTY**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Gregory Mullen ("Mullen") and files this Response to Debtor's Motion to Sell Property [Doc. 334] and would show this Court as follows: Mullen and his affiliated companies have bought and sold over 100 homes and 1000 apartments. Mullen and/or his affiliates will offer to purchase the homes listed on Exhibit A ("Homes") with the following terms:

1. \$205,000.00 cash
2. \$21,000.00 earnest money. Earnest money to be refundable until title policy is reviewed and approved
3. Purchase will be AS IS, WHERE IS and free and clear of liens, claims and encumbrances pursuant to 11 U.S.C. § 363(b)
4. Closing shall be 7 business days after receipt and approval of title policy by Mullen or his affiliates, in their sole discretion.
5. Mullen requests that he be given the opportunity to outbid any future bids on these Homes.

Respectfully Submitted,

Date: May 11, 2022

  
\_\_\_\_\_  
Gregory Mullen  
5206 McKinney Ave Suite 204  
Dallas, Texas 75205  
gmullen@cranehill.com

## CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was served upon:

Gregory W. Mitchell  
FREEMAN LAW  
1412 Main Street, Suite 500  
Dallas, Texas 75202

CHRISTOPHER J. MOSER, PLAN AGENT  
2001 Bryan Street, Suite 1800  
Dallas, Texas 75201-4240

Office of the United States Trustee  
110 N. College Avenue, Suite 300  
Tyler, Texas 75702

GRCDallasHomes LLC  
13220 Beach Club Road  
The Colony, TX 75056

via electronic means or by U.S. First Class Mail, on the 11th day of May 2022.

  
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Gregory Mullen  
5206 McKinney Ave Suite 204  
Dallas, Texas 75205  
gmullen@cranehill.com

## Exhibit A

1. 2505 Post Oak Lane, Oak Point, TX 75068, Denton County
2. 4430 Chapman. St, The Colony, TX 75056, Denton County
3. 4369 Sunset Circle, The Colony, TX 75056, Denton County